

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA

v.

ANNA LAYHER,
a/k/a “SUPERSTROKED23,”

Defendant

Case No. 1:24-mj-55

UNDER SEAL

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Corey Bolsei, a Special Agent with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), being duly sworn, depose and state as follows:

INTRODUCTION

A. Purpose of Affidavit

1. I am investigating the activities of Anna LAYHER (hereinafter “LAYHER”), the suspected user of Snapchat account SUPERSTROKED23. As detailed herein, I submit that probable cause exists to believe that in or about and between May 2022 through December 2022, LAYHER knowingly produced child sexual abuse material (CSAM) and distributed the CSAM to another Snapchat user within the Eastern District of Virginia, in violation of 18 U.S.C. §§ 2251(a) and 2252(a)(2).

B. Agent Background and Experience

2. I am a Special Agent with the U.S. Homeland Security Investigations and I have been so employed since September 2018. I am currently assigned to the HSI Office of the Special

Agent in Charge, Washington, D.C. (hereinafter “HSI DC”), and I have investigated crimes relating to child exploitation on the Internet since approximately January 2022. As part of my current duties as an HSI agent, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, transportation, possession, and access with intent to view child pornography, in violation of 18 U.S.C. § 2251(a) and 18 U.S.C. § 2252(a). I have received training in the area of child pornography and child exploitation, and I have had the opportunity to observe and review numerous examples of child pornography, as defined in 18 U.S.C. § 2256, including computer media. Through my experience and training, I can identify child pornography when I see it.

C. Sources of Information

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included details of every aspect or each and every fact known to me concerning this investigation. I make this affidavit based on personal knowledge, and information received from other law enforcement officers and/or agents. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was provided by another law enforcement officer or witness who may have had either direct or hearsay knowledge of that statement and to whom I or others have spoken, or whose reports I have read and reviewed. Such statements are among many statements made by others and are stated in substance and in part unless otherwise indicated. Further, my interpretations and explanations of the significance of certain events, records, and statements discussed herein may evolve or change as the investigation progresses and/or new information is discovered. I have set forth only the facts that I believe are necessary to establish probable cause to support an arrest warrant and criminal complaint.

INFORMATION REGARDING SNAPCHAT

4. Snapchat is a visual messaging app made by Snap, Inc. (“Snap”), a United States company and a provider of an electronic communications service as defined by 18 U.S.C. §§ 3127(1) and 2510. Specifically, Snapchat is a free-access social networking service, accessible as a mobile and web application.

5. Snap collects basic contact and personal identifying information from users during the Snapchat registration process. Snap also collects whether the account phone number has been verified.

6. Snap collects and retains information about how each user accesses and uses Snapchat. This includes information about the IP addresses used to create and use an account, unique identifiers and other information about devices and web browsers used to access an account, and session times and durations. Snap also collects account change history, which Snap describes as a log of changes in registration email or phone number, birthdate, and display name.

7. Each Snapchat account is identified by a username. A Snapchat username is a unique identifier associated with a specific Snapchat account. Snapchat usernames may be changed by a user once every 365 days. Unlike a username, a display name is not a unique identifier, and it can be changed repeatedly by a user, which changes how the display name appears to others within Snapchat. Users can also change how friends’ display names appear to them on Snapchat.

8. Snapchat offers four primary ways for users to communicate with each other.

- a. **Snaps** – Snaps are photos or videos taken using the Snapchat app’s camera on an individual mobile device. Snaps may be shared either directly in a Chat with one or a group of the user’s friends, or shared in a story. Users

can save a Snap message by pressing and holding on it to save while viewing or directly after viewing a Snap. After saving a Snap, the Snap will appear in the conversation as Chat Media. Snap's servers are designed to automatically delete a shared Snap after it has been opened by all recipients.

- b. **Stories** – A user can add Snaps, Memories, or images and video from their device camera roll to their “Story.” Snap's servers are currently designed to automatically delete the content in a user's Story, by default, 24 hours after it is shared on Snapchat, but the user may delete part or all of the Story earlier or may, in certain instances, change their settings to have the Story visible longer.
- c. **Memories** – Memories is Snapchat's cloud-storage service. Users can save their sent or unsent Snaps, posted Stories, and photos and videos from their device's camera roll in Memories. Content saved in Memories is backed up by Snap and may remain in Memories until deleted by the user. Users may choose to encrypt their content in Memories by saving it in “My Eyes Only,” in which case the content is not accessible to Snap and cannot be decrypted by Snap.
- d. **Chat** – A user can send text and send Snaps in Chat. A user may also send Memories, media uploaded from their device's camera roll, or audio notes (collectively “Chat Media”) to friends within the Snapchat app using the Chat feature. Users can Chat one-on-one or in groups.

PROBABLE CAUSE

9. As detailed below, the investigation revealed that Snapchat account SUPERSTROKED23 (LAYHER's account) distributed CSAM produced by LAYHER to Snapchat account JAKESMOOT2021, from her residence in Bealeton, Virginia.

Initiation of the Investigation Against Layher

10. On or around January 18, 2024, investigators received documents for the Snapchat account JAKESMOOT2021, pursuant to a federal search warrant in the Western District of Virginia, for the suspected purchase and possession of CSAM from an identified minor victim ("MV1") (year of birth 2008). Davey SISK is the suspected user for Snapchat account JAKESMOOT2021. A review of the JAKESMOOT2021 account identified Snapchat account SUPERSTROKED23 sending CSAM to JAKESMOOT2021.

11. Subscriber information for the Snapchat account SUPERSTROKED23 identified the display name as "Anna L" and a phone number ("540-xxx-x329") registered to Anna LAYHER. Local law enforcement information indicated that LAYHER and SISK were previously in a romantic relationship. From around May 2022 through around December 2022, multiple images were sent from Snapchat account SUPERSTROKED23 to JAKESMOOT2021 which contained CSAM images of a minor victim ("MV2") (year of birth 2017) and images of an adult female that matched open source and law enforcement database images of LAYHER. The images sent by SUPERSTROKED23 of MV2 to JAKESMOOT2021 matched images of a child believed to be a female relative of LAYHER that were publicly posted on LAYHER's Facebook account. A description of the CSAM and other relevant images produced and distributed by LAYHER are as follows:

- a. From on or around May 6, 2022, through around May 8, 2022, eight (8) images were sent from SUPERSTROKED23 to JAKESMOOT2021. Seven (7) of the eight (8) images were nude images or partially nude images of LAYHER. In three (3) of the nude images, LAYHER's face is partially concealed. On or around May 6, 2022, LAYHER sent an image of LAYHER seated, in a vehicle. The image captured from around the stomach area of LAHYER to the top of LAYHER's head, with no concealment of LAYHER's face.
- b. On or around June 6, 2022, SUPERSTROKED23 sent JAKESMOOT2021 an image of MV2, standing in what appears to be a living room, fully clothed and capturing MV2 (born in 2017) from MV2's feet to MV2's head in the frame of the image.
- c. On or around June 7, 2022, SUPERSTROKED23 sent JAKESMOOT2021 an image of LAYHER standing in a bathroom with LAYHER's face partially concealed by the cell phone used to take the image.
- d. On or around October 25, 2022, three CSAM images, suspected to be depicting MV2, were sent from SUPERSTROKED23 to JAKESMOOT2021. In those images, MV2 was lying on a bed with pink colored sheets and the words "JoJo Siwa" was identified on the sheets. The three images captured MV2 with a shirt on but with no clothing on below the waist. The frame of the three images was from around the stomach area to around the knee area of MV2. In the first image of MV2, MV2 was laying on MV2's stomach with the back of MV2's hands touching the

exposed buttocks of MV2. In the second image, what appears to be an adult's hand is observed holding one of MV2's leg, separating MV2's leg from MV2's other leg and exposing MV2's genitalia in the photo. What appears to be an adult's leg, wearing pink and white striped pants, is also observed directly below the adult hand holding one of MV2's legs. In the third image MV2 was laying on the bed on MV2's back with MV2's legs together and with the front of MV2's genitalia exposed in the photo. What appears to be an adult's hand is observed touching one of MV2's legs.

- e. On or around November 22, 2022, three images, suspected to be depicting MV2, were sent from SUPERSTROKED23 to JAKESMOOT2021. In all three images, taken in a bathroom, MV2 had no clothing on. The first image captured MV2 from around the shoulder to MV2's feet. The bathtub had water in it in the photo. MV2 appeared wet and was standing outside of the bathtub on a mat with MV2's back toward the camera, exposing her buttocks. In the second image, MV2 is standing in ankle deep water, in the bathtub, with MV2 covered in soap and with MV2's back facing the camera, again exposing her buttocks. In the third image, MV2 is standing in the bathtub. The frame of the image captured MV2 from the side, from MV2's feet to around the top of MV2's head. In the image MV2 appeared to be washing MV2's foot with a loofah.

12. Returns from the Snapchat search warrant for JAKESMOOT2021 showed that from around May 2022 through around December 2022, approximately twenty-seven (27) images were

sent from Snapchat account SUPERSTROKED23 to JAKESMOOT2021. No text conversations were identified in messages sent between Snapchat accounts SUPERSTROKED23 and JAKESMOOT2021.

13. Specifically, on or around March 13, 2022, LAYHER publicly posted an image taken in a mirror of LAYHER holding MV2 in a bedroom on LAYHER's Facebook account, found through open-source investigation. In that image, LAYHER is holding a pink cell phone which matches the pink cell phone observed in two images sent from Snapchat account SUPERSTROKED23 to JAKESMOOT2021. In the background of the Facebook photo of LAYHER and MV2, there is a window covered by floral curtains and two metallic colored brackets, separate from the curtains and rod, were mounted near the ceiling, above the window. Curtains with the same floral pattern, and one of the two metallic colored brackets, located above the curtains, was observed in an image sent by Snapchat account SUPERSTROKED23 to JAKESMOOT2021. In the same image sent by SUPERSTROKED23 to JAKESMOOT2021, was an adult female standing in front of a mirror, not wearing clothing, and holding a pink cell phone, which partially concealed her face in the image.

14. On around December 21, 2023, LAYHER was arrested by Fauquier County Sheriff's Office on Virginia state charges for the County of Greene. The image of LAYHER at the time of the arrest matches images sent by Snapchat account SUPERSTROKED23 to SISK's Snapchat account JAKESMOOT2021 and appears to be the same person in the Facebook photos associated with LAYHER's Facebook account described above.

The Residential Search Warrant is Served

15. On February 15, 2024, at approximately 6:00am, HSI, along with law enforcement officers from the Northern Virginia / Washington D.C. Internet Crimes Against Children Task

Force and Fauquier County Sheriff's Office, served a federal search warrant signed by the Honorable William E. Fitzpatrick, United States Magistrate Judge for the Eastern District of Virginia.

16. During the service of the federal search warrant, LAYHER, MV2, and another child (approx. 3 years of age) were located inside of the residence. LAYHER consented to be interviewed. At approximately 6:20am, an officer with Fauquier County Sheriff's Office and I interviewed LAYHER. LAYHER was read her Miranda warnings. LAYHER was provided the opportunity to read the Miranda warnings and ask questions. LAYHER agreed to speak with law enforcement.

17. During the audio recorded interview, LAYHER stated she knew SISK and used Snapchat to communicate with him. At first, she admitted taking and sending non-CSAM images of MV2 to SISK but denied using the SUPERSTROKED23 account. Later on, when sanitized CSAM photos of MV2 were shown to LAYHER, she admitted to taking the sexually explicit photos of MV2 with her phone and sending them to SISK using the SUPERSTROKED23 account. LAYHER stated that once SISK's Snapchat account was shut down, they continued to communicate using Telegram. She also admitted to sending CSAM of MV2 to SISK as recently as last week. LAYHER was taken into federal custody.

18. At the residence, unique bedding depicted in some of the CSAM photos were located, as well as distinct pants LAYHER was wearing in the images.

CONCLUSION

19. I submit that this affidavit supports probable cause to believe that in or about May 2022 through December 2022, LAYHER knowingly produced child pornography and distributed the produced child pornography to another Snapchat user.

Respectfully submitted,

COREY J
BOLSEI

Digitally signed by COREY J
BOLSEI
Date: 2024.02.15 11:13:38
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Special Agent Corey Bolsei
Homeland Security Investigations

Received by reliable electronic means and
sworn to before me over the telephone and
signed by me pursuant to Fed. R. Crim. P. 4.1
on this 15th day of February 2024.

William E. Fitzpatrick
The Honorable William E. Fitzpatrick
United States Magistrate Judge
Alexandria, Virginia